

GARY R. WHITMAN
February 9, 2010

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF INDIANA
3 INDIANAPOLIS DIVISION
4

5 - - -
6 NICHOLAS A. GREEN : CIVIL ACTION
7 :
8 :
9 VS. :
10 :
11 : Cause No.
12 FORD MOTOR COMPANY : 1:08-CV-0163-LJM-TAB
13 - - -

14
15 ORAL DEPOSITION OF GARY R. WHITMAN
16

17 February 9, 2010
18

19 - - -

20

21

22

23

24

25

GARY R. WHITMAN
February 9, 2010

1 BY MR. SCHIFERL:

2 Q. I've marked as Exhibit 2 -- what is the
3 item I marked as Exhibit 2?

4 A. I'm sorry?

5 Q. What is the item I've marked as Exhibit
6 2?

7 A. This is my Curriculum Vitae.

8 Q. Sir, I know a lot of your background
9 and all this, but let me ask, have you ever
10 participated as the designer of automotive
11 components that are incorporated in motor vehicles
12 sold to the motor vehicle public in the United
13 States?

14 A. By the motor vehicle public, are you
15 excluding Army and soldiers?

16 Q. I'm talking about vehicles that you or
17 I or anyone on the jury could go to a car lot and
18 purchase?

19 A. I would say no.

20 My participation in the design
21 of components has been for the Army, as far as
22 ground vehicles are concerned.

23 Q. The work that you indicated as
24 specialized area, there are ten listed here.

25 Let me ask, do you intend, in

GARY R. WHITMAN
February 9, 2010

1 A. I did.

2 Q. I don't want to put words in your
3 mouth, but you generally tend to provide testimony
4 in that area, as opposed to the testimony you just
5 described you understand Dr. Shanahan to be
6 providing?

7 A. Well, I'm going to talk about the
8 kinematics, as I said, in terms of the general
9 kinematics as to what you expect to see in
10 rollover crashes based upon the type of restraint
11 and the design that we have here and the testing
12 that's been conducted on restraint systems.

13 Dr. Shanahan, I think, will be
14 more case specific, in how those kinematics
15 resulted in the injuries that Mr. Green sustained.

16 Q. Next you list down here, a specialized
17 area of, quote, human subject crash testing, end
18 quote.

19 First of all, what do you mean
20 by that?

21 A. Well, human subject crash testing would
22 be testing conducted with human subjects or
23 surrogates.

24 Q. Did you conduct any such testing,
25 yourself, in this case?

GARY R. WHITMAN
February 9, 2010

1 A. No, I did not.

2 Q. Do you intend to offer any opinions
3 about that matter in this case?

4 A. In regards to the testing that was
5 conducted by Mr. Scott and Mr. Cooper, yes, I will
6 be discussing that testing, but that's not testing
7 that I was involved in conducting.

8 Q. Let me lay something perhaps to rest
9 right away.

10 Have you read Mr. Cooper's
11 deposition?

12 A. No, I have not.

13 Q. You've indicated -- you said the
14 testing conducted by Mr. Cooper. I'll represent
15 to you that I took his deposition and in his
16 deposition he indicated he did no testing. That
17 he was present when testing was done, but
18 conducted no testing himself.

19 Were you aware of that?

20 A. I'm not aware of the exact role of
21 Mr. Cooper versus Mr. Scott or anyone else that
22 did the testing.

23 I know they were both there.
24 I'm assuming that they both had some participation
25 but what that exact participation was, I don't